

1 MCGREGOR W. SCOTT  
2 United States Attorney  
3 GRANT B. RABENN  
4 Assistant United States Attorney  
5 501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700  
Facsimile: (916) 554-2900  
5

6 Attorneys for Plaintiff  
7 United States of America  
8

9  
10  
11 IN THE UNITED STATES DISTRICT COURT  
12 EASTERN DISTRICT OF CALIFORNIA

13  
14 UNITED STATES OF AMERICA,  
15 Plaintiff,  
v.  
KRISTY LYNN FELKINS,  
16 Defendant.

CASE NO. 2:20-CR-00175-TLN  
STIPULATION FOR EXTENSION OF TIME FOR  
STATUS CONFERENCE AND EXCLUSION OF  
TIME  
DATE: November 12, 2020  
TIME: 9:30 a.m.  
COURT: Hon. Troy L. Nunley

17 Plaintiff United States of America, by and through its attorney of record, Assistant United States  
18 Attorney GRANT B. RABENN, and defendant KRISTY LYNN FELKINS, both individually and by  
19 and through her counsel of record, LINDA C. ALLISON and HANNAH R. LABAREE, hereby stipulate  
20 as follows:

21 1. The Indictment in this case was filed on September 25, 2020, and defendant first  
22 appeared before a judicial officer of the Court in which the charges in this case were pending on  
23 September 30, 2020. By previous order, this matter was set for status on November 12, 2020 at 9:30  
24 a.m.

25 2. By this stipulation, defendant now moves to continue the status conference until February  
26 25, 2021, and to exclude time between November 12, 2020, and February 25, 2021, under Local Code  
27 T4.

28 3. The parties agree and stipulate, and request that the Court find the following:

1           a)     The government has represented that the discovery associated with this case  
2 includes reports and related documents constituting hundreds of pages of discovery. All of this  
3 discovery has been either produced directly to counsel and/or made available for inspection and  
4 copying.

5           b)     Counsel for defendant desires additional time to consult with her client, to review  
6 the current charges, conduct investigation and research related to the charges, to review and copy  
7 discovery, and discuss potential resolution with the client.

8           c)     Counsel for defendant believes that failure to grant the above-requested  
9 continuance would deny him/her the reasonable time necessary for effective preparation, taking  
10 into account the exercise of due diligence.

11          d)     The government does not object to the continuance.

12          e)     Based on the above-stated findings, the ends of justice served by continuing the  
13 case as requested outweigh the interest of the public and the defendant in a trial within the  
14 original date prescribed by the Speedy Trial Act.

15          f)     For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
16 et seq., within which trial must commence, the time period of November 12, 2020 to February  
17 25, 2021, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local  
18 Code T4] because it results from a continuance granted by the Court at defendant's request on  
19 the basis of the Court's finding that the ends of justice served by taking such action outweigh the  
20 best interest of the public and the defendant in a speedy trial.

21          4.     Nothing in this stipulation and order shall preclude a finding that other provisions of the  
22 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
23 must commence.

24  
25  
26         IT IS SO STIPULATED.  
27  
28

1 Dated: November 10, 2020

McGREGOR W. SCOTT  
United States Attorney

5 Dated: November 10, 2020

6 /s/ GRANT B. RABENN  
7 GRANT B. RABENN  
8 Assistant United States Attorney

9 /s/ LINDA C. ALLISON  
10 LINDA C. ALLISON  
11 Counsel for Defendant  
12 KRISTY LYNN FELKINS

13 [PROPOSED] FINDINGS AND ORDER

14 IT IS SO FOUND AND ORDERED this \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.  
15

16 \_\_\_\_\_  
17 THE HONORABLE TROY L. NUNLEY  
18 UNITED STATES DISTRICT JUDGE  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28